

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street, 10<sup>th</sup> Floor  
New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara L. Giwa  
*Executive Director*

Jennifer L. Brown  
*Attorney-in-Charge*

April 2, 2025

*By e-mail and ECF*

Honorable Andrew L. Carter  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

USDC SDNY  
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Re: *United States v. Georgina Torres*, 23 Cr. 668 (ALC)

Dear Judge Carter:

I write on consent (Assistant U.S. Attorney Jonathan Bodansky) to respectfully request that the Court adjourn the conference currently scheduled for April 3, 2025 at 12:30 p.m., for a period of around 30 days. The parties have reached an agreed-upon resolution in this case, and the adjournment will allow Ms. Torres – who lives in Houston, Texas, and has significant child-care responsibilities – to arrange to travel to this district to enter a plea. I further request that, if possible, the proceeding be scheduled for a Friday (other than May 16, 2025), as doing so will make it easier for Ms. Torres to make travel arrangements.

If the Court grants the adjournment, I request that time be excluded under the Speedy Trial Act until the next conference date for the reason set forth above.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ \_\_\_\_\_  
Martin Cohen  
Assistant Federal Defender  
(646) 588-8317

cc: Jonathan Bodansky, Esq., by e-mail and ECF  
William Stone, Esq., by e-mail and ECF

The application is **GRANTED**. A Change of Plea Hearing is scheduled for May 2, 2025 at 11:00 a.m. Time excluded from 4/2/25 to 5/2/25 in the interest of justice.

So Ordered.

  
4/2/25